

EXHIBIT B

Trimble Checks and Aventura Statement Reflecting the Stop Payment



Trimble Inc.
5475 KELLENBURGER ROAD, DAYTON, OHIO 45424-1099
TELEPHONE (937) 233-8921 FAX (937) 233-0884

Wells Fargo Bank Ohio, N.A.

66-382
412

CHECK NUMBER
420521

DATE	AMOUNT
07-NOV-19	\$101,364.72

One hundred one thousand three hundred sixty four and 72/100 Dollars.

PAY TO AVENTURA TECHNOLOGIES INC
THE 48 MALL DRIVE
ORDER COMMACK, NY 11725-5704
OF United States

Trimble Inc.

CHECKS OVER \$25,000 REQUIRE 2 SIGNATURES
VOID AFTER 90 DAYS

AVENTURA TECHNOLOGIE

⑈420521⑈ ⑆041203824⑆ 9600117258⑈

Trimble Inc.

5475 KELLENBURGER ROAD : DAYTON, OHIO 45424-1099

VOUCHER NUMBER	VENDOR INVOICE				PAYMENT AMOUNT
	DATE	VENDOR INV	AMOUNT	DISCOUNT	
1460735	23-SEP-19	738252	64,695.00	0.00	64,695.00
1457505	23-SEP-19	738260	24,421.00	0.00	24,421.00
1460736	25-SEP-19	738266	12,248.72	0.00	12,248.72
TOTAL AMOUNT PAID					101,364.72

Trimble Inc.

5475 KELLENBURGER ROAD : DAYTON, OHIO 45424-1099

VOUCHER NUMBER	VENDOR INVOICE				PAYMENT AMOUNT
	DATE	VENDOR INV	AMOUNT	DISCOUNT	
1469843	23-OCT-19	738322	35,750.00	0.00	35,750.00
TOTAL AMOUNT PAID					35,750.00

THE FACE OF THIS CHECK IS PRINTED GREEN - THE BACK CONTAINS A SIMULATED WATERMARK



Trimble Inc.

5475 KELLENBURGER ROAD : DAYTON, OHIO 45424-1099
TELEPHONE (937) 233-8921 FAX (937) 233-0884

Wells Fargo Bank Ohio, N.A.

56-382
412

CHECK NUMBER
421570

DATE	AMOUNT
05-DEC-19	\$35,750.00

Thirty five thousand seven hundred fifty and 00/100 Dollars

PAY TO AVENTURA TECHNOLOGIES INC
THE 48 MALL DRIVE
ORDER COMMACK, NY 11725-5704
OF United States

AVENTURA TECHNOLOGIE

Trimble Inc.

Angela Scheyer
John W. Boyce

CHECKS OVER \$25,000 REQUIRE 2 SIGNATURES
VOID AFTER 90 DAYS



⑈421570⑈ ⑆041203824⑆ 9600117258⑈

Trimble Inc.

5475 KELLENBURGER ROAD : DAYTON, OHIO 45424-1099

VOUCHER NUMBER	VENDOR INVOICE				PAYMENT AMOUNT
	DATE	VENDOR INV	AMOUNT	DISCOUNT	
1469842	14-OCT-19	738294	108,000.00	0.00	108,000.00
TOTAL AMOUNT PAID					108,000.00

THE FACE OF THIS CHECK IS PRINTED GREEN - THE BACK CONTAINS A SIMULATED WATERMARK



Trimble Inc.

5475 KELLENBURGER ROAD : DAYTON, OHIO 45424-1099
TELEPHONE (937) 233-8921 FAX (937) 233-0884

Wells Fargo Bank Ohio, N.A.

56-382
412

CHECK NUMBER
421145

DATE	AMOUNT
21-NOV-19	\$108,000.00

One hundred eight thousand and 00/100 Dollars

PAY TO AVENTURA TECHNOLOGIES INC
THE 48 MALL DRIVE
ORDER COMMACK, NY 11725-5704
OF United States

AVENTURA TECHNOLOGIE

Trimble Inc.

Angela Salazar
John W. Boyle

CHECKS OVER \$25,000 REQUIRE 2 SIGNATURES
VOID AFTER 90 DAYS



⑈421145⑈ ⑈041203824⑈ 9600117258⑈

EXHIBIT C

**Letter from Boies Schiller Flexner to Aventura of Government
Advising Trimble to Stop Payment on Their Checks to Aventura**

MATTHEW L. SCHWARTZ
Tel.: (212) 303-3646
E-mail: mlschwartz@bsfllp.com

June 8, 2020

BY ELECTRONIC MAIL

Mr. James M. Branden
The Law Office of James M. Branden
551 Fifth Avenue, Suite 422
New York, New York 10176
(212) 286-0173
jamesbranden@aol.com

**Re: *United States v. Aventura Technologies, Inc.,*
20 Cr. 583 (DRH) (ARL)**

Dear Mr. Branden:

I represent Trimble Inc. I am in receipt of your letter dated May 19, 2020, demanding payment in the amount of \$245,114.72 and further suggesting that Trimble may wish to purchase additional "inventory and parts" from Aventura.

Please be advised that following the filing of criminal charges against your client, Trimble was advised to stop payment on the outstanding checks by federal authorities. Trimble followed, and intends to continue following, the guidance of those authorities. Should you have any questions, you should speak to the government in the first instance.

With respect to your offer to engage in further business, given the serious allegations of misconduct that Aventura is facing, Trimble does not have any interest in maintaining a business relationship with Aventura. Had Trimble known about the misconduct of Aventura and its principals, Trimble would never have done business with it in the first place.

In the future, if you or your client has any need to contact Trimble, please direct any communications to me.

Sincerely,

/s/ Matthew L. Schwartz
Matthew L. Schwartz

BOIES SCHILLER FLEXNER LLP

EXHIBIT D

Aventura Bank Statement

AVENTURA TECHNOLOGIES INC
1 LADY JANES WAY
NORTHPORT NY 11768

Speak to a dedicated business solutions expert
at 1-888-755-2172 — a one-stop number for
both your business and personal needs.

ACCOUNT SUMMARY FOR PERIOD DECEMBER 01, 2021 - DECEMBER 31, 2021

Spark Basic Checking

AVENTURA TECHNOLOGIES INC

Previous Balance 11/30/21	\$164.05	Number of Days in Cycle	31
0 Deposits/Credits	\$0.00	Minimum Balance This Cycle	\$149.05
0 Checks/Debits	\$0.00	Average Collected Balance	\$164.05
Service Charges	(\$15.00)		
Ending Balance 12/31/21	\$149.05		

ACCOUNT DETAIL FOR PERIOD DECEMBER 01, 2021 - DECEMBER 31, 2021

Spark Basic Checking 00007528938007

AVENTURA TECHNOLOGIES INC

Date	Description	Deposits/Credits	Withdrawals/Debits	Resulting Balance
12/31	Maintenance charge		\$15.00	\$149.05
Total		\$0.00	\$15.00	

Spark Basic Checking 00007528938007

AVENTURA TECHNOLOGIES INC

SERVICE CHARGES

Date	Service Description	Number of Items	Fee per Item	Total
12/31	Maintenance charge			(\$15.00)
	Total Cycle Service Charge			(\$15.00)

Thank you for banking with us.

PAGE 1 OF 2

EXHIBIT E

Jack Cabasso Bank Statement



jack cabasso
1 Lady Janes Way
Northport NY 11768



jack cabasso,
Did you know you can manage your money quickly and conveniently with the Capital One mobile app?
Scan this QR Code with your phone's camera to download the top rated Capital One Mobile app.

Here's your **December 2021** bank statement.

STATEMENT PERIOD
Dec 1 - Dec 31, 2021

\$1,329.58

TOTAL ENDING BALANCE
IN ALL ACCOUNTS

Account Summary

ACCOUNT NAME	Dec 1	Dec 31
360 Checking...	\$45.37	\$1,329.58
All Accounts	\$45.37	\$1,329.58

Cashflow Summary

+ \$0.07	INTEREST EARNED THIS PERIOD
- \$0.00	FEES THIS PERIOD
- \$0.00	FINANCE CHARGES THIS PERIOD

EXHIBIT F

**Receipt of the Secretary of State of Delaware and the
Certificate of Incorporation of Aventura Technologies, Inc.**



State of Delaware

SECRETARY OF STATE
DIVISION OF CORPORATIONS
P.O. BOX 898
DOVER, DELAWARE 19903

8561491
SAM BRAVERMAN
51 TENAFLY ROAD
TENAFLY, NJ 07670

10-04-2021

DESCRIPTION	AMOUNT
3328879 - AVENTURA TECHNOLOGIES, INC. 4100 Plain Copy	
Plain Copy Fee	\$10.00
Expedite Fee, Same Day	\$40.00
3328879 - AVENTURA TECHNOLOGIES, INC. 4100 Plain Copy - 1 Copies	
TOTAL CHARGES	\$50.00
TOTAL PAYMENTS	\$50.00
BALANCE	\$0.00

CERTIFICATE OF INCORPORATION

AVENTURA TECHNOLOGIES, INC.

FIRST: The name of the corporation is AVENTURA TECHNOLOGIES, INC.

SECOND: Its Registered Office is to be located at 15 East North Street, Dover, Delaware 19901 in the county of Kent. The Registered Agent in charge thereof is W/K Incorporating Services, Inc.

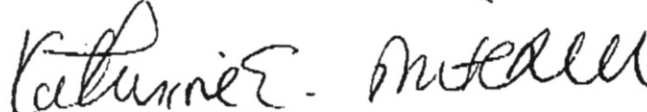
THIRD: The purpose of the corporation is to engage in any lawful act or activity for which corporations may be organized under the General Corporation Law of Delaware.

FOURTH: The amount of the total authorized capital stock of this corporation is Two Thousand, Five Hundred (2,500), common shares all of which shall be without par value.

FIFTH: The name and mailing address of the incorporator is as follows:

Katherine E. Mitchell
90 State Street
Albany, New York 12207

I, THE UNDERSIGNED, for the purpose of forming a corporation under the laws of the State of Delaware, do make, file and record this Certificate, and do certify that the facts herein are true, and I have accordingly hereunto set my hand this 12th day of December, 2000.



Incorporator
KATHERINE E. MITCHELL
90 State Street
Albany, New York

EXHIBIT G

Government Letter of January 11, 2022



U.S. Department of Justice

United States Attorney
Eastern District of New York

DMP:ICR/AFM/KCB
F. #2018R01047

271 Cadman Plaza East
Brooklyn, New York 11201

January 11, 2022

By Email

Samuel M. Braverman
Albert Y. Dayan
Kenneth J. Kaplan
John S. Wallenstein
Richard D. Willstatter

Re: United States v. Jack Cabasso, et al.
Criminal Docket No. 19-CR-582 (DRH)

Dear Counsel:

As you know, the government has been diligently reviewing and disclosing discovery in this matter since its first production of Rule 16 discovery on January 14, 2020. In the course of that review, the government has disclosed to the defendants voluminous emails and other electronic data identified during its review of the email accounts used by employees of defendant Aventura Technologies Inc. ("Aventura") that are subject to disclosure under applicable law, including Rule 16 of the Federal Rules of Criminal Procedure.

While the government has worked diligently to identify and produce to the defendants all material subject to disclosure under applicable law, the government is in possession of a large volume of electronic data and other material that it obtained in its investigation of the complex and long-running fraudulent schemes charged in this case. Accordingly, in an abundance of caution, the government has determined to make available to the remaining defendants in this case discovery broader than that which is required under applicable law.

Specifically, to ensure that the defendants have their own ability to independently search and review the below-listed categories of seized materials for documents and other information that they believe to be material to the preparation of their defense, the government intends to make available to each of the remaining defendants complete copies of the evidentiary materials listed below.

Under Federal Rule of Criminal Procedure 16.1(a), the purpose of this letter is to afford the defendants the opportunity to raise any objections to this proposed course of action.

Please provide any such objections or requests to the government in writing on or before January 21, 2022, so that we may attempt to confer and resolve any objections and requests before the status conference currently scheduled for January 28, 2022.

1) **Corporate email accounts obtained from providers**: On March 12, 2021, the government provided to Mr. Braverman, counsel for Aventura, a hard drive containing all of the contents of the Aventura corporate email accounts used by its employees that the government obtained from Rackspace and Microsoft pursuant to search warrants.¹ We understand from Mr. Willstatter's letter of March 11, 2021, see ECF No. 181, that Mr. Braverman in turn planned to make these data available to all of the remaining defendants in this case. **If you have not received a copy of this data, please advise us by January 21, 2021, so that we can ensure this data has been made available to all defendants.**

2) **Corporate email server**: The government intends to make available to all defendants a forensic image of 1B289, the Microsoft Exchange server that was seized from Aventura's offices and contains the contents of numerous Aventura corporate email accounts used by its employees.

3) **Microsoft accounts controlled by Jack Cabasso**: The government intends to make available to all defendants the contents of Jack Cabasso's Skype and Hotmail accounts.

4) **Mobile electronic devices**: The government intends to make available to all defendants full extractions of the seized mobile electronic devices that have been reviewed and have been determined to contain information of evidentiary value. The relevant identifying numbers for this evidence are 1B1, 1B8, 1B30, 1B31, 1B32, 1B36, and 1B45. Descriptions of the evidence (from the manifest produced to you on October 16, 2020 as AVENTURA_0000081309) are included below.

Item #	Seizing Address	Seizing Location	Description
1B1	Cabasso Residence	Person (Jack Cabasso)	ONE CELLOPHANE CONTAINING : one (1) Apple I Phone MODEL NUMBER : A1965 SERIAL NUMBER : 356720081470075
1B8	Cabasso Residence	Room T	ONE CELLOPHANE CONTAINING : PINK I-PAD WITH BLACK CASE, MODEL A1674, S/N DMPRL1GQH259

¹ The government previously provided the Microsoft email account data to Mr. James Branden, who was then counsel to Aventura, on November 25, 2020.

Item #	Seizing Address	Seizing Location	Description
1B30	Cabasso Residence	Room T	ONE CELLOPHANE CONTAINING: IPHONE WHITE, MODEL A1533, IMEI # 357989054500411
1B31	Cabasso Residence	Room T	ONE CELLOPHANE CONTAINING: SILVER I-PAD IN SILVER BLACK CASE, MODEL A1709, S/N: DMPVR702HPDV
1B32	Cabasso Residence	Room T	ONE CELLOPHANE CONTAINING: (1) WHITE/SILVER IPHONE, MODEL: A1549, IMEI: 359232069961973 (1) PINK IPHONE CASE
1B36	Cabasso Residence	Room G	ONE CELLOPHANE CONTAINING: (1) I-PAD, MODEL A1475, S/N: DMPLN4ZWF4J
1B45	Cabasso Residence	Room E	ONE CELLOPHANE CONTAINING: (1) IPHONE WITH CLEAR PLASTIC CASE, IMEI #: F17W1WTPJCL7

Furthermore, the following materials have already been produced to all of the defendants in this case:

5) **Seized computers:** The government has produced to all defendants forensic images of all seized personal computers and digital storage media that have been reviewed and have been determined to have evidentiary value, with the exception of personal mobile electronic devices. See Letter of August 17, 2021, ECF No. 213; Letter of November 3, 2021, ECF No. 220. Personal computers and digital storage media that have been determined not to have evidentiary value have been made available for return to their respective owners.

6) **Paper documents:** On November 3, 2021, the government provided scanned images of all of the paper documents seized from Aventura's corporate headquarters. See Letter of November 3, 2021, ECF No. 220.

4

EXHIBIT H

Invoices of Emma Greenwood Law Group, PLLC and Ledger of Paid Invoices

From: Greenwood Law Group, PLLC service@paypal.com
Subject: Reminder – You have an unpaid invoice
Date: November 8, 2021 at 10:11 AM
To: Sam Braverman sbraverman@fbdmLaw.com



Hello, sbraverman@fbdmLaw.com



Please pay your invoice

Greenwood Law Group, PLLC would like to remind you to
pay invoice 0004-Aventura-R.

Amount due: \$3,715.00 USD

Due on receipt

[View and Pay Invoice](#)



[Help & Contact](#) | [Security](#) | [Apps](#)



From: Greenwood Law Group, PLLC service@paypal.com
Subject: Reminder – You have an unpaid invoice
Date: November 8, 2021 at 10:11 AM
To: Sam Braverman sbraverman@fbdmLaw.com



Hello, sbraverman@fbdmLaw.com



Please pay your invoice

Greenwood Law Group, PLLC would like to remind you to pay invoice 0003-Aventura-R.

Amount due: \$4,917.09 USD

Due on receipt

[View and Pay Invoice](#)



[Help & Contact](#) | [Security](#) | [Apps](#)



Activities Export

Date	Type	Description	Matter	User	Qty	Rate (\$)	Non-billable (\$)	Billable (\$)
10/11/2021	\$	Greenwood Legal Group IT Invoice 00005-Aventura - R ● Billed invoice 1840	00728-Cabasso Client - Adventura Technologies Case is "US v. Cabasso, et al.", 19 Cr. 582 (EDNY)	Sam Braverman	1.00	120.00	-	120.00
10/11/2021	\$	Greenwood Law Group invoice for IT, Invoice 00006-Aventura-R ● Billed invoice 1840	00728-Cabasso Client - Adventura Technologies Case is "US v. Cabasso, et al.", 19 Cr. 582 (EDNY)	Sam Braverman	1.00	289.00	-	289.00
10/04/2021	\$	Order expedited (1 day vs. 10 weeks) certificate of incorporation from Delaware Secretary of State. (\$50) Pay for FedEx to have document overnight. (\$25) ● Billed invoice 1840	00728-Cabasso Client - Adventura Technologies Case is "US v. Cabasso, et al.", 19 Cr. 582 (EDNY)	Sam Braverman	1.00	75.00	-	75.00
05/19/2021	\$	March and April IT expert invoices, including hardware. ● Billed invoice 1725	00728-Cabasso Client - Adventura Technologies Case is "US v. Cabasso, et al.", 19 Cr. 582 (EDNY)	Sam Braverman	1.00	3,277.31	-	3,277.31
02/15/2021	\$	Emma Greenwood-purchase and mailing of external encrypted hard drive, speak with SMB and Richard Willstatter re data recovery, correspondence, etc. per invoice for December, 2020 ● Billed invoice 1611	00728-Cabasso Client - Adventura Technologies Case is "US v. Cabasso, et al.", 19 Cr. 582 (EDNY)	Sam Braverman	1.00	1,529.93	-	1,529.93
							\$0.00 0.0h	\$5,291.24 0.0h